

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
No. 1:18-cv-502**

LLOYD BUFFKIN JR. et al.,
Plaintiffs

v.

ERIK HOOKS et al.,
Defendants.

**JOINT MOTION
FOR PRELIMINARY APPROVAL
OF PROPOSED CONSENT DECREE**

Defendants and the appointed representatives of the Plaintiff class, Lloyd Buffkin Jr. and Robert Parham (“Class Representatives”), respectfully move the Court under Federal Rule of Civil Procedure 23 to:

- preliminarily approve their negotiated proposed consent decree, attached as Exhibit A, to resolve all remaining claims in this action;
- approve their proposed form of notice of settlement to class members, attached as Exhibit B; and
- set a date for hearing on the fairness, adequacy, and reasonableness of the proposed consent decree on or after January 4, 2021.

In support of this Joint Motion, the parties submit the brief at Dkt. 111.

Respectfully submitted this 5th day of October, 2020 by:

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CERTIFICATE OF SERVICE

I certify that this day I served the foregoing by filing it with the CM/ECF system,
which has provided notice to all counsel of record.

This 5th day of October, 2020.

/s/Emily E. Seawell

Emily E. Seawell

Class Counsel